

Date: July 7, 2003
To: Federal Communications Commission
From: James Venneman
12060 Holly Vista Way
Auburn, California 95603

Re: Notice of Inquiry - ET Docket 03-104 (Broadband Over Power Line)

Dear Commissioners,

I am writing to express my concern over the current proposal to remove regulatory hurdles to the deployment of BPL technology and allow the electric utilities to operate this technology at higher power levels than presently authorized.

I have been an amateur radio operator for 42 years, currently holding callsign WX6V. The events of recent years have underscored the need within our nation of viable corps of amateur radio operators in the event of an emergency or natural disaster. Examples abound of the efforts made by amateur operators to provide valuable communications when no other means existed, whether on land, on sea, or in the air. I personally assist groups of amateur radio operators in the annual emergency communications exercise held each June under the auspices of the American Radio Relay League, using frequencies in the 3.5 - 21 Mhz. frequency bands. It is the potential interference to these frequency bands that I am most concerned about, in addition to the potential for interference caused by the legal operation of my radio equipment to the users of this technology.

I already have had some experience with the potential for interference caused by Part 15 devices, when a manufacturer inadvertently manufactured and sold wireless modems that operated in the 3.5 Mhz amateur band that were installed in homes throughout my community. These devices caused such significant interference to my station that parts of this band were completely unusable.

I understand that the electric utility companies would be responsible for operating and maintaining the BPL system. This is disconcerting, because I experienced a high degree of power line noise interference a few years ago while living at another location. When I called my local utility company (Pacific Gas & Electric) to complain, my complaints were totally ignored, despite numerous requests for service. A neighboring amateur operator had advised me that he had been dealing with this same noise problem for years and had no success dealing with this particular utility company. Should I expect any higher level of service from them if the BPL signal interferes with my amateur station?

I live next to a mid-sized condominium complex. To date, I have had no interference issues with the residents there resulting from the operation of my amateur station. I can only imagine the potential for harassment and/or legal liability in the event that the legal operation of my station would cause my neighbor's broadband access to become inoperable.

Lastly, the utility industry is apparently making the claim that BPL signals running more than 10,000 watts EIRP can coexist with amateur stations. My comment to this is simply - Prove It! To date, there have been no field trials that have specifically included Amateur Radio nor have used the specific infrastructure proposed for this service. I have read about the results of field tests in other parts of the world (Europe and Japan) where interference to the Amateur Radio Service was shown to exist.

While I realize the potential revenue windfall for beleaguered utility companies throughout our nation, I implore the Commissioners to cast a wary eye on this technology for the interference potential it has on all users of the HF spectrum (3.5 - 28 Mhz.).